

August 11, 2010

Philip Giudice  
Commissioner  
Department of Energy Resources  
100 Cambridge Street, 10<sup>th</sup> floor  
Boston, MA 02114

RE: DOER BIOMASS RPS RULEMAKING PROCESS COMMENTS

Dear Commissioner Giudice:

Crane & Company, Inc., doing business at 30 South Street, Dalton, MA is a producer of fine specialty papers and has been manufacturing the paper used in US Currency since 1879. There are 851 Berkshire County based employees. The company and the Crane family have over the years built a rich history of environmental stewardship and are setting a new target of driving toward a fully sustainable future. The company's vision is to conserve natural resources, reduce waste, improve efficiencies, and support and encourage the development and implementation of renewable technologies within our company that will reduce our carbon footprint and support a high quality of life in our community. Our major customer, the US government is encouraging it's suppliers to adapt renewable technologies and to take environmental aspects and impacts of a business into the decision making process. The language in government contracts states that "The contractor shall make every effort to provide the most environmental friendly materials to the Bureau." Crane is required to comply with "Executive Order 13423 – Strengthening Federal Environmental, Energy and Transportation Management". This order is required for Federal Agencies but also applies to materials being procured by the Federal Government.

The company is in the process of building a small hydroelectric power plant at one of the company dams located at the Byron Weston Mill that will generate 230 kW. A back pressure turbine is also on line at this facility that could generate 225 kW. This unit takes 400 PSI steam and reduces it to 100 PSI where it can be used for process and building heating. This energy is used to turn a turbine that generates electricity used on site. The company has installed high efficiency lighting at many facilities including the mills where US currency papers are manufactured. A solar photovoltaic cell project is being planned and another backpressure turbine installation.

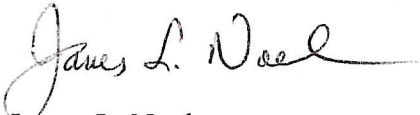
Crane and Company is working with a developer, Berkshire Renewable Power who has gathered a team of scientists, financiers, and technology providers to site a plant that would generate a bio oil from a pyrolysis process utilizing the RTP (Rapid Thermal Process). Simply put, biomass (forest fiber and algae) is suspended on sand heated to 500 C where it is vaporized and then rapidly cooled to generate the bio oil. This process takes less than two seconds. There is no competition with food based feed stocks and sourcing of the biomass will come from the surrounding areas within an anticipated 50 mile radius. We have visited the commercial plant that generates this oil and demonstrates the effectiveness of this technology. We feel that this process is a great fit for our vision to use sustainable sources to generate energy for use in our operations. We anticipate the use of this bio oil in diesel engines that will generate electricity for the company's use. We also envision the use of the oil as a replacement of Number 6 Fuel oil at our two stand alone power plants. Approximately 70 % of the company thermal energy presently is supplied by an "Energy from Waste" plant. Converting over to this bio oil for the remaining 30% will eliminate the use of fossil fuels for this part of our operations and help us reach our vision. Sulfur content of the bio oil is very low and SOx emissions are similar to natural gas.

Crane & Company supports the RTP Pyrolysis Technology and the use of biomass as a renewable, sustainable energy source and feels that with proper forestry management that in the end the scientific community will undoubtedly conclude that biomass (which contains biogenic carbon) will be much more effective in reducing greenhouse gases than fossil fuels (which contain anthropogenic carbon). In addition, the company encourages DOER to consider that, in light of the significant benefits provided by combusting bio oil instead of a fossil fuel, the use of bio oil for electricity generation should not be subject to arbitrary efficiency standards in order to qualify under the Renewable Portfolio Standard. The company feels that it is critical that this RTP process is included under the Renewable Portfolio Standard to support the justification for its implementation.

If you have any questions, I can be reached at 413-684-6319. Thank you for this consideration.

Sincerely,

CRANE CURRENCY DIVISION

A handwritten signature in cursive script that reads "James L. Noel". The signature is written in dark ink and is positioned above the printed name and title.

James L. Noel  
Manager of Environmental Affairs